

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

ERIC YOUNG and ADAM KURTZ, on behalf of themselves and all others similarly situated

Case No. 2:19-cv-01902 (JLR)

Plaintiffs,

V.

iFINEX INC.; BFXNA INC.; BFXWW INC.; TETHER HOLDINGS LIMITED; TETHER LIMITED; DIGFINEX INC.; TETHER OPERATIONS LIMITED; TETHER INTERNATIONAL LIMITED; AND JOHN DOES 1-50.

Defendants.

STIPULATION AND [PROPOSED] ORDER

TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(A)

16 The Parties, by and through their undersigned counsel, hereby stipulate and
17 agree that this action should be transferred from the United States District Court for
18 the Western District of Washington, Seattle Division, to the United States District
19 Court for the Southern District of New York, New York Division. Defendants shall
20 accept service of process in the Southern District of New York. The Parties also
21 stipulate and agree that this Stipulation and Order, and transfer of the action
22 pursuant to this Stipulation and Order, shall not be deemed to waive any of
23 Defendants' defenses, including but not limited to objections to lack of personal
24 jurisdiction; however, such jurisdictional defenses shall not include any defenses of
25 improper service of process. The parties hereby stipulate to entry of the subjoined
26 order.

1 Dated: New York, NY
2 December 30, 2019

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Counsel for Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited

Dated: San Diego, CA
December 30, 2019

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12 Dated: Seattle, WA
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21 Dated: New York, NY
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12 **ORDER**
13 Based on the foregoing stipulation of the parties, this action shall be
14 transferred to the United States District Court for the Southern District of New
15 York. The clerk is directed to initiate transfer of the action. The within Stipulation
16 and Order, and transfer of the action pursuant to the within Stipulation and Order
17 shall not be deemed to waive any of Defendants' defenses, including but not limited
18 to objections to lack of personal jurisdiction; however, such jurisdictional defenses
19 shall not include any defenses of improper service of process. No attorneys' fees or
20 costs shall be awarded in connection with this transfer.

21 Dated this ____ day of December 2019.

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24 The Honorable James L. Robart
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